REMARKS

The foregoing amendments and the following remarks are responsive to the Office Action mailed September 12, 2003. Applicants respectfully request reconsideration of the present application.

Claims 1-66 are pending. Claims 1, 6-8, 11-13, 19, 36, 38, 41, and 43-45 are amended. Claims 20-21, 30, and 37 are canceled. New claims 67-70 have been added. Therefore, claims 1-19, 22-29, 31-36, and 38-70 are presented for examination.

Examiner rejected claims 1-5, 9, 11-21, 24-27, 30-32, 36-40, 42-53, 56-59, 62, 63 under 35 U.S.C. §102(e) as being unpatentable over U.S. Patent No. 6,438,576 issued to Huang, et al.

Huang discusses a system using a collaborative proxy system for distributed deployment of object rendering. In Huang's system:

> If a copy of the requested object can be found in the local cache, at step 402, the proxy server checks the cached object against the RHI to see if any further rendering is necessary. Note that the RHI contains the capability specification of the receiving device (i.e. the device that originally requested the object that was just found in the cache). By checking the RHI, the proxy server 110, 111, 112 can determine if any further rendering is necessary. If no further rendering is necessary, the proxy server modifies the RHI to indicate its local condition for providing rendering services and returns the object at step 403.

(Huang, column 7, line 43-52). Thus, it is clear from Huang, that the copy of the object in the cache is not formatted for a specific device, since the cached object must be checked against the RHI. Furthermore, Huang does not teach or suggest generating a cache lookup key based on the identity of the particular photographic image and the format specified by the target device, because the cache does not store device specific formats.

Claim 1, as amended, specifically recites:

> In an online system, a method for providing digital photographic images to target devices, the method comprising:

receiving a request to provide a target device with a copy of a particular photographic image;

determining capabilities of the target device;

based on the capabilities of the target device, determining a format that is desired for providing the target device with a copy of the particular photographic image;

generating a cache lookup key based on the identity of the particular photographic image and the format specified by the target device;

determining whether a cached copy of the particular photographic image already exists in said determined format using the cache lookup key;

if a cached copy exists, providing the target device with the cached copy of the particular photographic image;

if a cached copy does not exist, translating the particular photographic image into a copy having said determined format; and

providing the target device with the copy having said determined format.

(Claim 1, as amended, emphasis added). Thus, claim 1, specifically recites that the cache lookup is based on the format specified by the target device. Huang clearly does not teach or suggest this, as the system of Huang needs to perform a comparison with the format after retrieving the data from the cache. Therefore, claim 1, and claims 2-35 which depend on it, are not anticipated by or obvious over Huang.

Claim 36, as amended, recites:

An online photographic server system for providing digital photographic images to target devices, the system comprising:

a storage module for storing digital photographic images for sharing among users; and

a photographic server:

for processing a request to provide a target device with a copy of a particular photographic image;

for automatically determining capabilities of the target device; and

for providing the target device with a copy of the particular photographic image, said copy being automatically translated into a particular format based on the capabilities of the target device;

a cache memory to store translated copies of photographic images, the cache memory having a cache lookup key based on the identity of the particular photographic image and the format that is desired.

(Claim 36, as amended, emphasis added). As noted above Huang does not teach or suggest a cache memory to store translated copies of photographic images, since in Huang's system the comparison to the device capabilities is performed after retrieval from

the cache. Therefore, claim 36, and claims 37-66 which depend on it, are not anticipated by or obvious over Huang.

Newly added claim 67 recites:

> An system to provide media to a plurality of clients comprising:
> a communication means to receive a request a particular media from a client;
> <u>a cache memory to store translated copies of the media, the translated copies formatted for various clients;</u>
> <u>a cache lookup logic to use a cache lookup key based on an identity of the particular piece of media and parameters of the requesting client;</u> and
> a translation mechanism to translate the media into the proper format, if the media is not in the cache in the proper format.

(Claim 67, emphasis added). As discussed above, Huang's cache does not store translated copies, formatted for various clients. Therefore, claim 67, and claims 68-70 which depend on it, are not anticipated by or obvious over Huang.

Examiner rejected claims 6, 7, 41 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,438,576 issued to Huang in view of U.S. Patent No. 6,202,097 issued to Foster, et al.

Foster discusses methods for performing diagnostic functions in a multiprocessor data processing system having a serial diagnostic bus. Foster's system does not address or discuss the use of caching. Furthermore, there is no suggestion either in Huang or Foster for the combination suggested by the Examiner.

Additionally, Foster does not teach or suggest the elements missing in Huang, specifically storing translated copies in a cache with a cache lookup using the translation characteristics. Since claims 6 and 7 depend on claim 1, and claim 41 depends on claim 36, and both sets of claims incorporate their respective parents' limitations, for at least the same reasons advanced above with respect to the independent claims, Huang in view of Foster does not make the claims obvious.

Examiner rejected claim 8 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,438,576 issued to Huang in view of U.S. Patent No. 6,592,629 issued to Cullen, et al.

Cullen discusses a document image storage system that includes a control mechanism that automatically archives a document image in response to a document being produced by a peripheral device. The document image storage system also includes a memory machine and a remote storage facility coupled to the memory machine. Cullen does not teach or suggest the use of a cache for storing data optimized for a particular device, and a corresponding cache lookup key.

Cullen does not teach or suggest the elements missing in Huang, specifically storing translated copies in a cache with a cache lookup using the translation characteristics. Since claim 8 depends on claim 1, and incorporates its limitations, for at least the same reasons advanced above with respect to claim 1, Huang in view of Cullen does not make the claims obvious.

Examiner rejected claims 10, 22, 23, 54 and 55 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,438,576 issued to Huang in view of U.S. Patent No. 6,141,686 issued to Jackowski, et al.

Jackowski discusses a client-side application-classifier for gathering network-traffic statistics. Jackowski's system does not address or discuss the use of caching. Furthermore, there is no suggestion either in Huang or Jackowski for the combination suggested by the Examiner.

Additionally, Jackowski does not teach or suggest the elements missing in Huang, specifically storing translated copies in a cache with a cache lookup using the translation characteristics. Since claims 10, 22, and 23 depend on claim 1, and claims 54 and 55 depend on claim 36, and both sets of claims incorporate their respective parents' limitations. Therefore, for at least the same reasons advanced above with respect to the independent claims, Huang in view of Jackowski does not make the claims obvious.

Examiner rejected claims 28 and 60 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,438,576 issued to Huang in view of the Applicant's Admitted Prior Art (APA). The Admitted Prior Art does not teach or suggest using caching in this manner. Therefore, for at least the reasons advanced above with respect to the independent claims, Huang and the APA do not make the claims obvious.

Examiner rejected claims 29, 33-35, 61 and 64-66 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,438,576 issued to Huang in view of U.S. Patent No. 6,411,685 issued to O'Neal.

O'Neal discusses a system for providing unified messaging to a user with a thin web browser. O'Neal does not address optimizing for various devices, nor the use of caches. Furthermore, there is no suggestion either in Huang or O'Neal for the combination suggested by the Examiner.

Additionally, O'Neal does not teach or suggest the elements missing in Huang, specifically storing translated copies in a cache with a cache lookup using the translation characteristics. Since claims 29 and 33-35 depend on claim 1, and claims 61 and 64-66 depend on claim 36, and both sets of claims incorporate their respective parents claims. Therefore, for at least the same reasons advanced above with respect to the independent claims, Huang in view of O'Neal does not make the claims obvious.

In view of the foregoing amendments and remarks, Applicants respectfully submit that all pending claims are in condition for allowance. Such allowance is respectfully requested.

If the Examiner finds any remaining impediment to the prompt allowance of these claims that could be clarified with a telephone conference, the Examiner is respectfully requested to contact Judith A. Szepesi at (408) 720-8598.

If there are any additional charges, please charge Deposit Account No. 02-2666.

Respectfully submitted,

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Judith A. Szepesi
Reg. No. 39,393

12400 Wilshire Blvd.
Seventh Floor
Los Angeles, CA 90025
(408) 720-8598